Abrines, David

From: Park, Andy
Sent: Thursday, May 01, 2014 4:17 PM
To: Abrines, David
Subject: FOIA 2014-005703, Item 3
Attachments: RE: Communications with Solvay; RE: Solvay - Data Reports from PWS Sampling; RE: Solvay - Data Reports from PWS Sampling; RE: Solvay - Data Reports from PWS Sampling; Solvay - Data Reports from PWS Sampling; FW: Solvay - e-copies; Solvay - e-copies; RE: Q/A RE: Solvay Specialty Polymers USA LLC, West Deptford, NJ (NJD980753875); Re: Q/A RE: Solvay Specialty Polymers USA LLC, West Deptford, NJ (NJD980753875); Solvay Specialty Polymers USA LLC, West Deptford, NJ (NJD980753875)

Abrines, David

From: Azzam, Nidal
Sent: Tuesday, April 01, 2014 11:28 AM
To: Gertz, Mitchell
Cc: Park, Andy; Everett, Adolph ✓
Subject: RE: Communications with Solvay

Will do Mitch. Thank you for the information.

Nidal Azzam,
Base Program Management Section, Chief
Hazardous Waste Programs Branch
Clean Air and Sustainability Division
USEPA Region 2
290 Broadway, 22nd Floor
New York, NY 10007
212-637-3748 Office
212-637-4437 Fax

From: Gertz, Mitchell [mailto:mitchell.gertz@solvay.com]
Sent: Tuesday, April 01, 2014 10:28 AM
To: Azzam, Nidal
Subject: Communications with Solvay

Nidal,

For any residents or other interested parties that request contact information for Solvay from you regarding the PFC investigation please provide the follwoing contatc information:

Charles Jones
856-251-3409 or

Geoff Pass
856-251-3417

--

Mitch Gertz
Solvay Specialty Polymers
HSE Compliance Manager
T: 856-251-6630 - M: 856-371-9318
10 Leonard Lane
West Deptford, NJ 08086
www.solvay.com

Abrines, David

From: Philip Goodrum <pgoodrum@integral-corp.com>
Sent: Tuesday, March 11, 2014 12:02 PM
To: Park, Andy; Azzam, Nidal
Cc: mitchell.gertz@solvay.com; Sarah Park; Thomas Buggey (tbuggey@rouxinc.com)
Subject: RE: Solvay - Data Reports from PWS Sampling

Andy – yes, we can certainly do that.

Phil

Philip E. Goodrum, Ph.D. | Senior Managing Scientist
Integral Consulting Inc. | www.integral-corp.com
7030 E Genesee Street, Suite 110 | Fayetteville, NY 13066
Tel: 315.446.5090 | Cell: 315.396.6655

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: Park, Andy [mailto:Park.Andy@epa.gov]
Sent: Tuesday, March 11, 2014 12:00 PM
To: Philip Goodrum; Azzam, Nidal
Cc: mitchell.gertz@solvay.com; Sarah Park; Thomas Buggey (tbuggey@rouxinc.com)
Subject: RE: Solvay - Data Reports from PWS Sampling

Good morning,

It is alright with me with a condition that hard copies be provided to us upon request. Nidal, please let me know if it is problematic.

Andrew Park
U.S. EPA Region 2
212-637-4184

From: Philip Goodrum [mailto:pgoodrum@integral-corp.com]
Sent: Tuesday, March 11, 2014 10:14 AM
To: Azzam, Nidal; Park, Andy
Cc: mitchell.gertz@solvay.com; Sarah Park; Thomas Buggey (tbuggey@rouxinc.com)
Subject: Solvay - Data Reports from PWS Sampling

Good morning Nidal and Andy – in collaboration with Roux Associates, we anticipate generating a series of data reports for the ongoing sampling of PWSs conducted by Solvay in the West Deptford, NJ area this year. As you are aware, copies of those reports have been submitted to each of you, NJDEP, and the PWS facility manager. These data reports include extensive paper printouts of laboratory analytical chemistry, along with electronic files of the same. We would like to reduce the many thousands of pages paper that would accompany submittals in 2014. Would electronic copies of the laboratory reports be sufficient for you going forward?

Thank you,

Phil

Philip E. Goodrum, Ph.D. | Senior Managing Scientist
Integral Consulting Inc. | www.integral-corp.com
7030 E Genesee Street, Suite 110 | Fayetteville, NY 13066
Tel: 315.446.5090 | Cell: 315.396.6655

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

Abrines, David

From: Philip Goodrum <pgoodrum@integral-corp.com>
Sent: Tuesday, March 11, 2014 10:14 AM
To: Azzam, Nidal; Park, Andy
Cc: mitchell.gertz@solvay.com; Sarah Park; Thomas Buggey (tbuggey@rouxinc.com)
Subject: Solvay - Data Reports from PWS Sampling

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Thank you,

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Integral Consulting Inc. | www.integral-corp.com
7030 E Genesee Street, Suite 110 | Fayetteville, NY 13066
Tel: 315.446.5090 | Cell: 315.396.6655

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

Abrines, David

From: Park, Andy
Sent: Wednesday, February 12, 2014 3:33 PM
To: 'mitchell.gertz@solvay.com'
Cc: Azzam, Nidal; Erica.Bergman@dep.state.nj.us
Subject: Solvay - e-copies

Mitch,

The CD for the East Greenwich PWS sampling report appears to be empty. Can you please provide me with an e-copy of the report? If possible, can you also provide me with e-copies of the West Deptford PWS Sampling Report and the Paulsboro PWS Sampling Report? I am willing to download them from a Web link or you may send me a CD containing the reports. I appreciate your support. Thanks.

Andrew Park
Hazardous Waste Programs Branch
U.S. Environmental Protection Agency Region 2
290 Broadway, 22nd Fl.
New York, New York 10007-1866
212-637-4184

Abrines, David

From: Azzam, Nidal
Sent: Tuesday, March 11, 2014 12:19 PM
To: Park, Andy; Philip Goodrum
Cc: mitchell.gertz@solvay.com; Sarah Park; Thomas Buggey (tbuggey@rouxinc.com)
Subject: RE: Solvay - Data Reports from PWS Sampling

That is fine

Nidal Azzam,
Base Program Management Section, Chief
Hazardous Waste Programs Branch
Clean Air and Sustainability Division
USEPA Region 2
290 Broadway, 22nd Floor
New York, NY 10007
212-637-3748 Office
212-637-4437 Fax

From: Park, Andy
Sent: Tuesday, March 11, 2014 12:00 PM
To: Philip Goodrum; Azzam, Nidal
Cc: mitchell.gertz@solvay.com; Sarah Park; Thomas Buggey (tbuggey@rouxinc.com)
Subject: RE: Solvay - Data Reports from PWS Sampling

Good morning,

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Andrew Park
U.S. EPA Region 2
212-637-4184

From: Philip Goodrum [mailto:pgoodrum@integral-corp.com]
Sent: Tuesday, March 11, 2014 10:14 AM
To: Azzam, Nidal; Park, Andy
Cc: mitchell.gertz@solvay.com; Sarah Park; Thomas Buggey (tbuggey@rouxinc.com)
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of those reports have been submitted to each of you, NJDEP, and the PWS facility manager. These data reports include extensive paper printouts of laboratory analytical chemistry, along with electronic files of the same. We would like to reduce the many thousands of pages paper that would accompany submittals in 2014. Would electronic copies of the laboratory reports be sufficient for you going forward?

Thank you,

Phil

Philip E. Goodrum, Ph.D. | Senior Managing Scientist
Integral Consulting Inc. | www.integral-corp.com
7030 E Genesee Street, Suite 110 | Fayetteville, NY 13066
Tel: 315.446.5090 | Cell: 315.396.6655

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

Abrines, David

From: Park, Andy
Sent: Tuesday, March 11, 2014 12:00 PM
To: Philip Goodrum; Azzam, Nidal ✓
Cc: mitchell.gertz@solvay.com; Sarah Park; Thomas Buggey (tbuggey@rouxinc.com)
Subject: RE: Solvay - Data Reports from PWS Sampling

Good morning,

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Andrew Park
U.S. EPA Region 2
212-637-4184

From: Philip Goodrum [mailto:pgoodrum@integral-corp.com]
Sent: Tuesday, March 11, 2014 10:14 AM
To: Azzam, Nidal; Park, Andy
Cc: mitchell.gertz@solvay.com; Sarah Park; Thomas Buggey (tbuggey@rouxinc.com)
Subject: Solvay - Data Reports from PWS Sampling

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Thank you,

Phil

Philip E. Goodrum, Ph.D. | Senior Managing Scientist
Integral Consulting Inc. | www.integral-corp.com
7030 E Genesee Street, Suite 110 | Fayetteville, NY 13066
Tel: 315.446.5090 | Cell: 315.396.6655

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

Abrines, David

From: Philip Goodrum <pgoodrum@integral-corp.com>
Sent: Wednesday, February 12, 2014 4:46 PM
To: Park, Andy
Cc: mitchell.gertz@solvay.com; Azzam, Nidal; erica.bergman@dep.state.nj.us; Sarah Park; Thomas Buggey (tbuggey@rouxinc.com)
Subject: FW: Solvay - e-copies
Attachments: Integral_2014_Data_Report_East_Greenwich_PWS_Sampling_01_29_2014 - cvr.pdf; Integral_2013_Data_Report_West_Deptford_MUA_Sampling_12_03_2013 - cvr.pdf; Integral_2014_Data_Report_Paulsboro_MUA_Sampling_01_06_2014_wCoverLetter.pdf

Andy – we apologize for the error with the CD contents on the East Greenwich PWS data report submittal. Please see attached for e-copies of the following per your request:

- E Greenwich – Sampling Event on Dec 19, 2013
- W Deptford – Sampling Event on Oct 30, 2013
- Paulsboro – Sampling Event on Nov 26, 2013

A new CD will be sent to you via express mail that includes the full contents of the data reports for all six PWS facilities that have been reported to date (including National Park, Westville, and Woodbury). This CD will include the EDDs and the laboratory reports (which are too large to send by email).

Please don't hesitate to call or email if I can provide any additional information.

Thank you,

Phil

Philip E. Goodrum, Ph.D. | Senior Managing Scientist
Integral Consulting Inc. | www.integral-corp.com
7030 E Genesee Street, Suite 110 | Fayetteville, NY 13066
Tel: 315.446.5090 | Cell: 315.396.6655

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: Gertz, Mitchell [mailto:mitchell.gertz@solvay.com]
Sent: Wednesday, February 12, 2014 3:48 PM
To: Philip Goodrum
Subject: Fwd: Solvay - e-copies

Phil,

Please provide Andy with the requested files and follow up on the CD issue for EGR.

Thanks

---------- Forwarded message ----------
From: **Park, Andy** <Park.Andy@epa.gov>
Date: Wed, Feb 12, 2014 at 3:33 PM
Subject: Solvay - e-copies

To: "mitchell.gertz@solvay.com" <mitchell.gertz@solvay.com>
Cc: "Azzam, Nidal" <Azzam.Nidal@epa.gov>, "Erica.Bergman@dep.state.nj.us" <Erica.Bergman@dep.state.nj.us>

Mitch,

The CD for the East Greenwich PWS sampling report appears to be empty. Can you please provide me with an e-copy of the report? If possible, can you also provide me with e-copies of the West Deptford PWS Sampling Report and the Paulsboro PWS Sampling Report? I am willing to download them from a Web link or you may send me a CD containing the reports. I appreciate your support. Thanks.

Andrew Park

Hazardous Waste Programs Branch

U.S. Environmental Protection Agency Region 2

290 Broadway, 22nd Fl.

New York, New York 10007-1866

212-637-4184

--

Mitch Gertz
Solvay Specialty Polymers
HSE Compliance Manager
T: 856-251-6630 - M: 856-371-9318
10 Leonard Lane
West Deptford, NJ 08086
www.solvay.com

ENVIRONMENTAL CONSULTING & MANAGEMENT
ROUX ASSOCIATES INC
402 Heron Drive
Logan Township, New Jersey 08085 TEL 856-423-8800 FAX 856-241-4670

January 29, 2014

Erica Bergman
NJDEP - Bureau of Case Management
401 E. State Street - Mail Code 401-05
P.O. Box 420
Trenton, New Jersey 08625-0420

Re: East Greenwich Public Water System (PWS) Sampling Results (NJ 0803001)
Solvay West Deptford Plant
10 Leonard Lane
West Deptford, New Jersey 08086-2150

Dear Ms. Bergman:

As the Licensed Site Remediation Professional (LSRP) retained by Solvay Specialty Polymers USA, LLC (Solvay), I have reviewed the enclosed sampling results for perfluorinated compounds (PFCs) from the East Greenwich PWS wells and I am submitting them on behalf of Solvay. Enclosed are three copies of the data in New Jersey Department of Environmental Protection (NJDEP) electronic data delivery (EDD) format and a summary report for your internal distribution. These EDDs were verified by Solvay to be complete and free of errors with NJDEP's online tool, Electronic Data Submittal Applications (EDSA7) version 7.1.5.

The report includes a description of the wells that were sampled, a figure illustrating where samples were collected within the distribution system, and a table summarizing the laboratory results. In addition, the report includes a table that summarizes some of the current state and federal interim drinking water guidelines for PFCs. While these guidelines are non-binding at this time, they may provide East Greenwich PWS with a helpful perspective to facilitate communication of findings to the community.

As noted in the PFC work plan that I submitted to you on November 15, 2013, Solvay is coordinating with seven municipalities within a five mile radius to sample well water for PFCs: West Deptford, Paulsboro, Westville, Woodbury, East Greenwich, National Park, and Greenwich. The enclosures constitute the fifth of seven MUA data reports. A similar report is being submitted today for National Park and previous submissions have been made for West Deptford, Paulsboro, Westville, and Woodbury.

Solvay has adopted a rigorous quality assurance protocol for sampling, chain of custody documentation, analysis, and reporting of results. Each PWS sampling event includes field duplicates, laboratory quality control samples, and data validation conducted by a third party independent validator. In addition, 10-20 percent of the samples across all sampling events have been selected for split sample analysis at a second New Jersey-

certified laboratory to assess inter-laboratory variability in analytical results. Split sample results will be included in the data reports for sampling at West Deptford, East Greenwich, and Greenwich. Please feel free to contact Mitch Gertz with any questions.

Sincerely,
ROUX ASSOCIATES, INC.

Thomas R. Buggey, LSRP #580659
Principal Hydrogeologist

cc: Mitch Gertz, Solvay Specialty Polymers
Phil Goodrum, Integral Consulting Inc.

Enclosures

integral consulting inc.

DATA REPORT

East Greenwich PWS Sampling on December 19, 2013

Prepared for
Solvay Specialty Polymers USA, LLC
10 Leonard Lane
West Deptford, NJ 08086

Prepared by
Integral Consulting Inc.
200 Harry S. Truman Parkway
Suite 330
Annapolis, MD 21401

January 27, 2014

DATA REPORT

East Greenwich PWS
Sampling on December 19, 2013

Prepared for
Solvay Specialty Polymers USA, LLC
10 Leonard Lane
West Deptford, NJ 08086

Prepared by

integral consulting inc.
200 Harry S. Truman Parkway
Suite 330
Annapolis, MD 21401

January 27, 2014

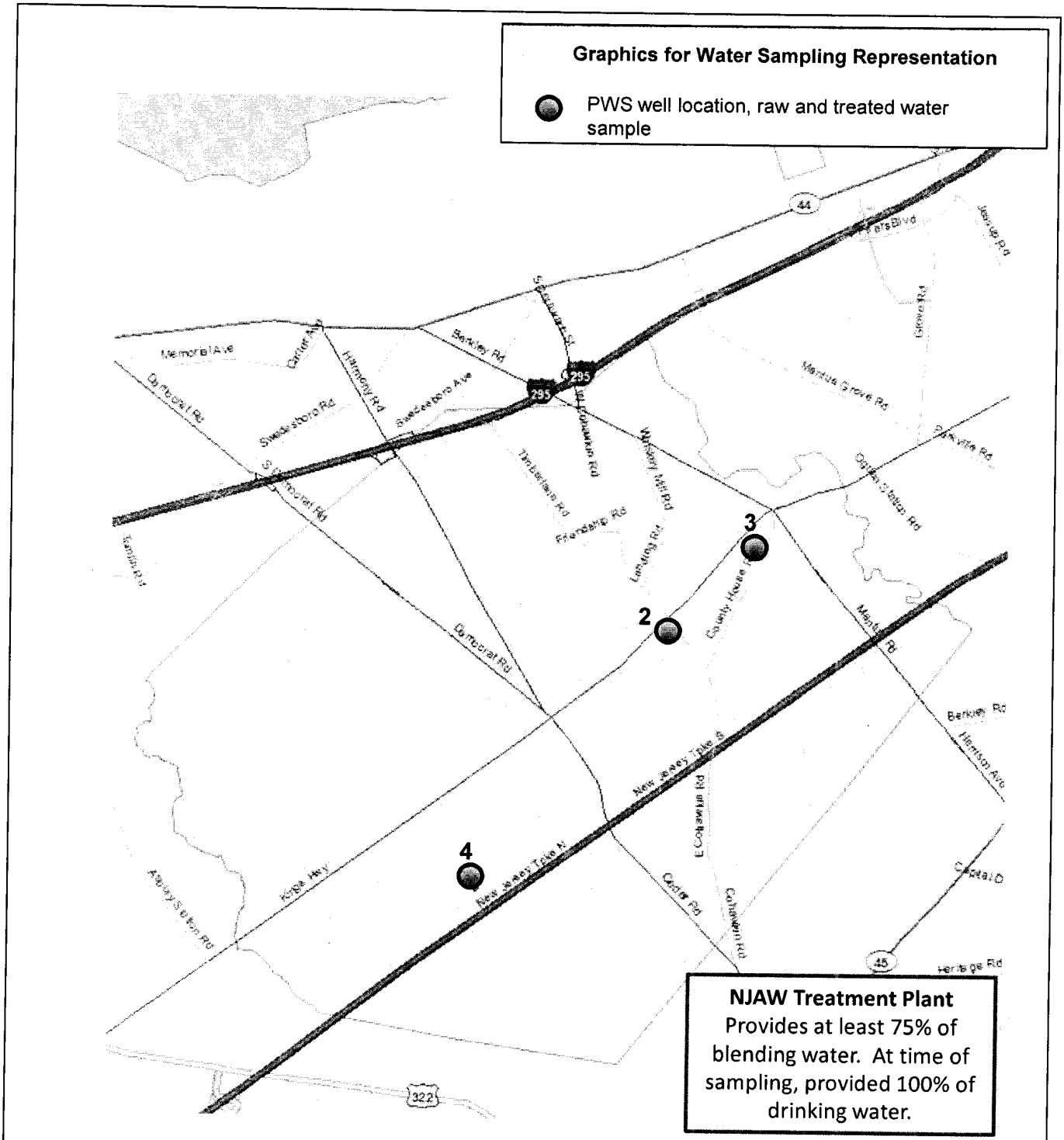
On December 19, 2013, Integral Consulting Inc., consultant to Solvay Specialty Polymers USA, LLC (Solvay), collected water samples from the three water supply wells maintained by the East Greenwich public water system (PWS). The samples were submitted to Eurofins Eaton Analytical, Inc. (Monrovia, CA), a New Jersey-certified analytical testing laboratory for analysis of perfluorinated compounds (PFCs). In addition, split samples were submitted to TestAmerica Laboratories, Inc. (Edison, NJ), also a New Jersey-certified analytical laboratory, for analysis of conventional parameters.

Figure 1 illustrates where samples were collected within the East Greenwich PWS treatment system. Based on our understanding of East Greenwich PWS operations, none of the three wells were active during the sampling event on December 19 and all drinking water was being supplied by New Jersey American Water treatment plant. Nonetheless, both raw and treated water was sampled from Well #3 and raw water was sampled from Well #2 and Well #4.

Table 1 summarizes the concentrations of PFCs measured in each raw and treated water sample. The same are also provided in electronic files, using the electronic data delivery (EDD) format specified by New Jersey Department of Environmental Protection (NJDEP). These EDDs were verified by Solvay to be complete and free of errors with NJDEP's online tool, Electronic Data Submittal Applications (EDSA7) version 7.1.5, available online at www.state.nj.us/dep/srp/hazsite/software/edsa/. All of the laboratory results were validated by Laboratory Data Consultants, Inc. (Carlsbad, CA), an independent third party validator.

PFCs are currently unregulated in drinking water. Table 2 summarizes a range of non-binding drinking water guidelines for perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) available from U.S. Environmental Protection Agency, New Jersey, North Carolina, and Minnesota. For this sampling event at East Greenwich PWS, concentrations in all samples were below the New Jersey drinking water guidelines for PFOA (i.e., 40 parts per trillion or ppt) and PFOS (i.e., 20 ppt). Concentration ranges are 0.2–5.9 ppt for PFOA and 2.7–3.4 ppt for PFOS.

One PFC was detected for which drinking water guidelines have not been established. Perfluorononanoic acid (PFNA) was detected in samples from Well #3 but not the other two Wells. At Well #3, PFNA was measured in parent and field duplicates in both raw water (21 and 22 ppt) and treated water (24 and 23 ppt). None of the C10 to C13 compounds (i.e., perfluorodecanoic acid [PFDA] and perfluoroundecanoic acid [PFUnDA]) were detected in any of the samples.



Notes:
NJAW = New Jersey American Water
PWS = public water system

East Greenwich PWS and approximate sample locations from sampling event on 12/19/2013. All three wells pump from Potomac-Raritan-Magothy (PRM) confined aquifer. None were actively supplying water at the time of sampling, but samples of raw water and water treated with either hypo-chlorination or gas chlorination were taken at all three wells. The main water supply comes from NJAW which provides at least 75% of water supply.

integral consulting inc.

DRAFT

Figure 1.
East Greenwich Public Water System (PWS)
Sample Locations and Flow Diagram

Table 1. PFC Concentrations from Samples Collected December 19, 2013 at the East Greenwich PWS [a]

Chemical Name	Well #2	Well #4	Well #3			
	RW	RW	RW	RW-Dup	TW	TW-Dup
PFOA	--	--	4.1	4.2	4.8	5.9
PFOS	--	--	2.8	2.7	3.3	3.4
PFNA	--	--	21	22	24	23
PFDA	--	--	--	--	--	--
PFUnA	--	--	--	--	--	--
PFDoDA	--	--	--	--	--	--
PFTriA	--	--	--	--	--	--

Notes:

PFC = perfluorinated compound

PWS = public water system

RW = raw water sample collected from well (prior to treatment)

RW-Dup = field duplicate of raw water sample

TW = sample collected from well after treatment but before mixing with water from other wells or supplemental water

TW-Dup = field duplicate of treated well water sample

-- = anlayte was not detected at the calculated method detection limit

[a] Units for all results are parts per trillion (ppt), equivalent to nanograms per liter (ng/L) or $1x10^{-9}$ grams per liter.

Table 2. Federal and State PFC Guidelines for Drinking Water

Agency	Chemical Name [a]						
	PFOA	PFOS	PFNA	PFDA	PFUnA	PFDoDA	PFTriA
U.S. Environmental Protection Agency [b]	400	200	--	--	--	--	--
North Carolina Department of Environmental and Natural Resources [c]	200	--	--	--	--	--	--
New Jersey Department of Environmental Protection [d]	40	20	--	--	--	--	--
Minnesota Department of Health [e]	300	300	--	--	--	--	--

Sources:

USEPA. 2009. Provisional Health advisories for perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS). Available at: http://water.epa.gov/action/advisories/drinking/upload/2009_01_15_criteria_drinking_pha-PFOA_PFOS.pdf. U.S. Environmental Protection Agency. 5 pp. January 8.

NJDEP. 2007. Determination of perfluorooctanoic acid (PFOA) in aqueous samples. Final Report. New Jersey Department of Environmental Protection, Division of Water Supply, Bureau of Safe Drinking Water, Trenton, NJ. 17 pp. January.

NCDENR. 2013. Appendix #1: Interim maximum allowable concentrations (IMACs). pp. 23-24. In: North Carolina Administrative Code Title 15A - Classifications and Water Quality Standards Applicable to the Groundwaters of North Carolina. Last amended April 1. Available at: http://portal.ncdenr.org/web/wq/ps/csu/gwstandards. North Carolina Department of Environmental and Natural Resources, Division of Water Quality, Raleigh, NC. 31 pp.

MDH. 2013. Health guidelines for perfluorochemicals (PFCs) in drinking water. www.health.state.mn.us/divs/eh/hazardous/topics/pfcs/drinkingwater.html. Minnesota Department of Health, Environmental Health Division, St. Paul, MN.

Notes:

PFC = perfluorinated compound

-- = provisional guidelines are not available for drinking water

[a] Units for all results are parts per trillion (ppt).

[b] USEPA (2009) provisional drinking water advisory for short-term exposure.

[c] NCDENR (2013) recommended interim maximum allowable concentration (IMAC) in drinking water, effective date December 6, 2006.

[d] NJDEP (2007) health-based guidance value intended to protect for chronic (lifetime) exposure.

[e] MDH (2011) health risk limit (HRL) in drinking water for chronic exposure.

ENVIRONMENTAL CONSULTING & MANAGEMENT
ROUX ASSOCIATES INC
402 Heron Drive
Logan Township, New Jersey 08085 TEL 856-423-8800 FAX 856-241-4670

January 13, 2014

Erica Bergman
NJDEP - Bureau of Case Management
401 E. State Street - Mail Code 401-05
P.O. Box 420
Trenton, New Jersey 08625-0420

Re: Paulsboro Municipal Well Sampling Results
Solvay West Deptford Plant
10 Leonard Lane
West Deptford, New Jersey 08086-2150

Dear Ms. Bergman:

As the Licensed Site Remediation Professional (LSRP) retained by Solvay Specialty Polymers USA, LLC (Solvay), I have reviewed the enclosed sampling results for perfluorinated compounds (PFCs) from the Paulsboro Municipal Utility Authority (PMUA) wells and I am submitting them on behalf of Solvay. Enclosed are three copies of the data in New Jersey Department of Environmental Protection (NJDEP) electronic data delivery (EDD) format and a summary report for your internal distribution. These EDDs were verified by Solvay to be complete and free of errors with NJDEP's online tool, Electronic Data Submittal Applications (EDSA7) version 7.1.5. At the request of PMUA, a courtesy copy of the same material was provided to PMUA on January 6, 2014, prior to submitting the report to NJDEP.

The report includes a description of the wells that were sampled, a figure illustrating where samples were collected within the distribution system, and a table summarizing the laboratory results. In addition, the report includes a table that summarizes some of the current state and federal interim drinking water guidelines for PFCs. While these guidelines are non-binding at this time, they may provide PMUA with a helpful perspective to facilitate communication of findings to the community.

As noted in the PFC Work Plan that I submitted to you on November 15, 2013, Solvay is coordinating with seven municipalities to sample well water for PFCs. The enclosures constitute the second of seven MUA data reports. The first data report with results for sampling at West Deptford MUA was submitted to the NJDEP in December 2013. As mentioned in the transmittal letter included with the West Deptford data report, Solvay has adopted a rigorous quality assurance protocol. Each sampling event includes field duplicates, laboratory QC samples, and data validation conducted by a third party independent validator. In addition, 10-20 percent of the samples across all sampling events have been selected for split sample analysis at a second laboratory to assess inter-laboratory variability in analytical results. Samples collected at Paulsboro are not among

the subset of samples that have been selected. Please feel free to contact Mitch Gertz with any questions.

Sincerely,

Thomas R. Buggey, LSRP #580659
Principal Hydrogeologist

cc: Mitch Gertz - Solvay Specialty Polymers
Phil Goodrum - Integral Consulting Inc.

Enclosures

DATA REPORT

Paulsboro MUA
Sampling on November 26, 2013

Prepared for
Solvay Specialty Polymers USA, LLC
10 Leonard Lane
West Deptford, NJ 08086

Prepared by

integral consulting inc.
200 Harry S. Truman Parkway
Suite 330
Annapolis, MD 21401

January 06, 2014

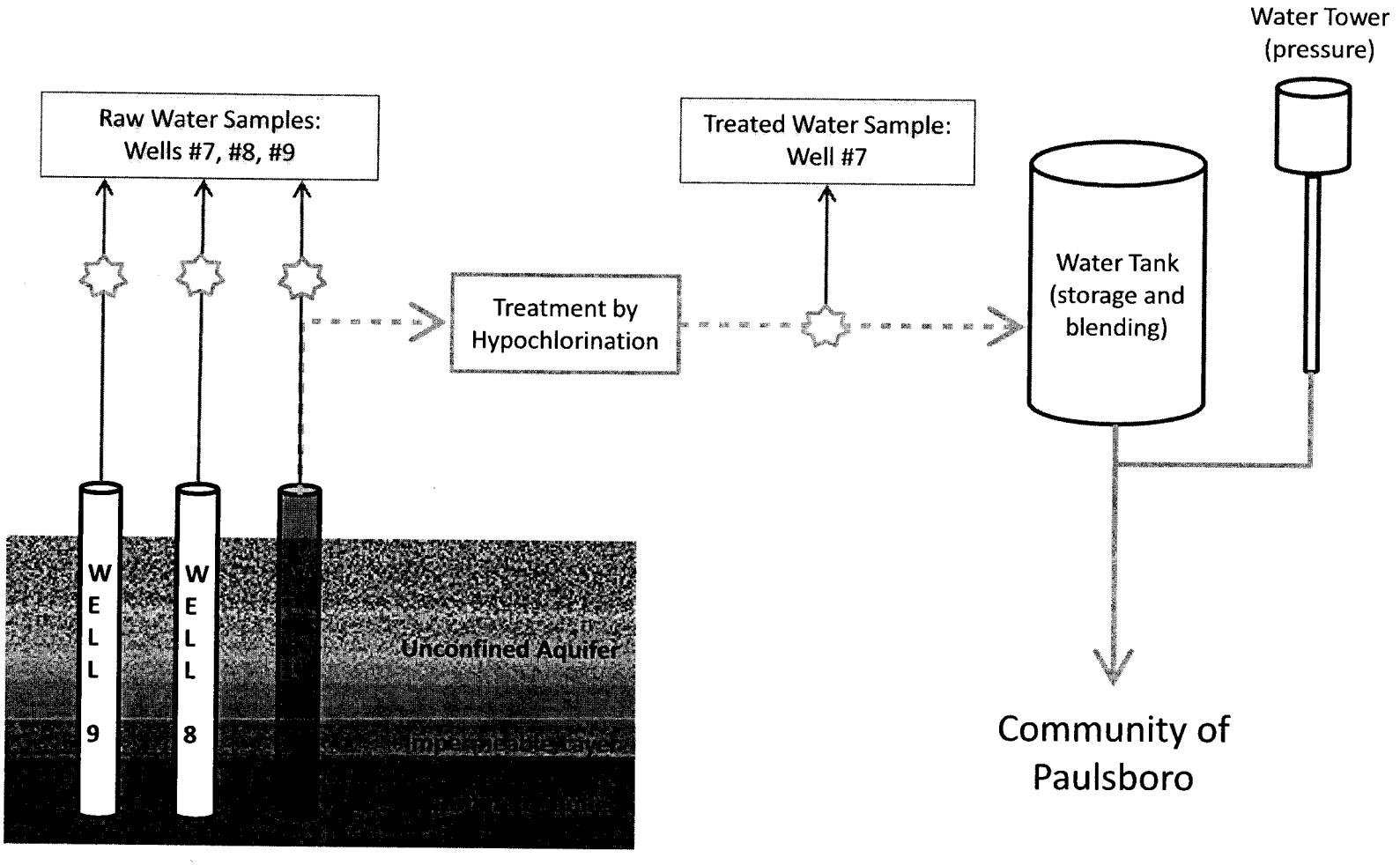
On November 26, 2013, Integral Consulting Inc., consultant to Solvay Specialty Polymers USA, LLC (Solvay), collected water samples from the three water supply wells maintained by the Paulsboro Municipal Utility Authority (MUA). The samples were submitted to Eurofins Eaton Analytical, Inc. (Morovia, CA), a New Jersey-certified analytical testing laboratory for analysis of perfluorinated compounds (PFCs). In addition, split samples were submitted to TestAmerica Laboratories, Inc. (Edison, NJ), also a New Jersey-certified analytical laboratory, for analysis of conventional parameters.

Figure 1 illustrates where samples were collected within the Paulsboro MUA treatment system. Based on our understanding of Paulsboro MUA operations, Well #7 was the only active well during the sampling event on November 26. Both raw and treated water was sampled from Well #7. Wells #8 and #9 were offline due to treatment for radium, aluminum, and other water quality parameters. Only raw water was collected from these two wells.

Table 1 summarizes the concentrations of PFCs measured in each raw and treated water sample. The same are also provided in electronic files, using the electronic data delivery (EDD) format specified by New Jersey Department of Environmental Protection (NJDEP). These EDDs were verified by Solvay to be complete and free of errors with NJDEP's online tool, Electronic Data Submittal Applications (EDSA7) version 7.1.5, available online at www.state.nj.us/dep/srp/hazsite/software/edsa/. All of the laboratory results were validated by Laboratory Data Consultants, Inc. (Carlsbad, CA), an independent third party validator.

PFCs are currently unregulated in drinking water. Table 2 summarizes a range of non-binding drinking water guidelines for perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) available from U.S. Environmental Protection Agency, New Jersey, North Carolina, and Minnesota. For this sampling event at Paulsboro MUA, concentrations in all samples were below the New Jersey drinking water guidelines for PFOA (i.e., 40 parts per trillion or ppt) and PFOS (i.e., 20 ppt). Concentration ranges are 19–34 ppt for PFOA and 1.6–15 ppt for PFOS.

Several PFCs were detected for which drinking water guidelines have not been established. Perfluorononanoic acid (PFNA) was detected in samples from all three wells. At Well #7, PFNA was measured in parent and field duplicates in both raw water (88 and 92 ppt) and treated water (96 and 110 ppt). In Wells #8 and #9, both of which were inactive, PFNA was detected in raw water at 7.4 and 15 ppt. Two of the C10 to C13 compounds (i.e., perfluorodecanoic acid [PFDA] and perfluoroundecanoic acid [PFUnDA]) were detected in Wells #7 and #8, but not in Well #9.



Notes

Distance between wells is greater than the diagram suggests. Wells #8 and #9, located on Summit Ave, are separated from Well #7 by several miles. Depths and screening intervals are not available at this time. All three wells pump from the Potomac-Raritan-Magothy (PRM) confined aquifer and there is no supplemental water supply. Only Well #7 was supplying water at the time of sampling. Wells #8 and #9 are undergoing additional treatment to reduce radium, aluminum, and iron and increase pH. All three wells were in working order and available for raw water sampling.

integral consulting inc.

Figure 1.
Location of Raw and Treated Water Samples Collected at the Paulsboro MUA on November 26, 2013

Table 1. PFC Concentrations from Samples Collected November 26, 2013 at the Paulsboro MUA [a]

Chemical Name	Well #8	Well #9	Well #7			
	RW	RW	RW	RW-Dup	TW	TW-Dup
PFOA	19	34	23	24	26	27
PFOS	15	1.6 J	4.8	4.9	5.7	5.9
PFNA	15	7.4	92	88	96	110
PFDA	0.78 J	--	0.39 J	0.41 J	0.57 J	0.42 J
PFUnA	0.76 J	--	0.77 J	0.46 J	1.2 J	0.74 J
PFDoDA	--	--	--	--	--	--
PFTriA	--	--	--	--	--	--

Notes:

MUA = Municipal Utility Authority

PFC = perfluorinated compound

RW = raw water

RW-Dup = raw water laboratory duplicate sample

TW = treated well water (these samples are indicative of the concentrations in drinking water at the time of sampling - see Figure 1)

TW-Dup = treated well water laboratory duplicate sample

-- = anlayte was not detected at the calculated method detection limit

J = result was detected at or greater than the method detection limit and less than method reporting limit

[a] Units for all results are parts per trillion (ppt).

Table 2. Federal and State PFC Guidelines for Drinking Water

Agency	Chemical Name [a]						
	PFOA	PFOS	PFNA	PFDA	PFUnA	PFDoDA	PFTriA
U.S. Environmental Protection Agency [b]	400	200	--	--	--	--	--
North Carolina Department of Environmental and Natural Resources [c]	200	--	--	--	--	--	--
New Jersey Department of Environmental Protection [d]	40	20	--	--	--	--	--
Minnesota Department of Health [e]	300	300	--	--	--	--	--

Sources:

USEPA. 2009. Provisional Health advisories for perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS). Available at: http://water.epa.gov/action/advisories/drinking/upload/2009_01_15_criteria_drinking_pha-PFOA_PFOS.pdf. U.S. Environmental Protection Agency. 5 pp. January 8.

NJDEP. 2007. Determination of perfluorooctanoic acid (PFOA) in aqueous samples. Final Report. New Jersey Department of Environmental Protection, Division of Water Supply, Bureau of Safe Drinking Water, Trenton, NJ. 17 pp. January.

NCDENR. 2013. Appendix #1: Interim maximum allowable concentrations (IMACs). pp. 23-24. In: North Carolina Administrative Code Title 15A - Classifications and Water Quality Standards Applicable to the Groundwaters of North Carolina. Last amended April 1. Available at: http://portal.ncdenr.org/web/wq/ps/csu/gwstandards. North Carolina Department of Environmental and Natural Resources, Division of Water Quality, Raleigh, NC. 31 pp.

MDH. 2013. Health guidelines for perfluorochemicals (PFCs) in drinking water. www.health.state.mn.us/divs/eh/hazardous/topics/pfcs/drinkingwater.html. Minnesota Department of Health, Environmental Health Division, St. Paul, MN.

Notes:

PFC = perfluorinated compound

-- = provisional guidelines are not available for drinking water

[a] Units for all results are parts per trillion (ppt).

[b] USEPA (2009) provisional drinking water advisory for short-term exposure.

[c] NCDENR (2013) recommended interim maximum allowable concentration (IMAC) in drinking water, effective date December 6, 2006.

[d] NJDEP (2007) health-based guidance value intended to protect for chronic (lifetime) exposure.

[e] MDH (2011) health risk limit (HRL) in drinking water for chronic exposure.

ENVIRONMENTAL CONSULTING & MANAGEMENT
ROUX ASSOCIATES INC
ROUX
402 Heron Drive
Logan Township, New Jersey 08085 TEL 856-423-8800 FAX 856-241-4670

December 3, 2013

Erica Bergman
NJDEP - Bureau of Case Management
401 E. State Street - Mail Code 401-05
P.O. Box 420
Trenton, NJ 08625-0420

Re: West Deptford Municipal Well Sampling Results
Solvay West Deptford Plant
10 Leonard Lane
West Deptford, NJ 08086-2150

Dear Ms. Bergman:

As the Licensed Site Remediation Professional (LSRP) retained by Solvay Specialty Polymers USA, LLC (Solvay), I have reviewed the attached sampling results for perfluorinated compounds (PFCs) from the West Deptford Municipal Utility Authority (MUA) wells and I am submitting them on behalf of Solvay. Enclosed are three copies of the data in New Jersey Department of Environmental Protection (NJDEP) electronic data delivery (EDD) format and a summary report for your internal distribution. These EDDs were verified by Solvay to be complete and free of errors with NJDEP's online tool, Electronic Data Submittal Applications (EDSA7) version 7.1.5.

The report includes a description of the wells that were sampled, a figure illustrating where samples were collected within the distribution system, and a table summarizing laboratory results. In addition, the report includes a table that summarizes some of the current state and federal interim drinking water guidelines for PFCs. While these guidelines are non-binding at this time and would apply to finished (blended) water rather than individual samples as reported, they may provide WDMUA with a helpful perspective to facilitate communication of findings to the community.

As noted in the PFC Work Plan that I submitted to you on November 15, 2013, Solvay is coordinating with seven municipalities to sample well water for PFCs. The enclosures constitute the first of seven MUA data reports. Results include split samples to assess variability between NJDEP-certified laboratories as well as data validation conducted by a third party independent validator. In the future, each dataset will continue to undergo independent data validation, but Solvay will randomly select 10-20 percent of samples for evaluation of inter-laboratory variability. Please feel free to contact Mitch Gertz with any questions.

Sincerely,

Thomas R. Buggey, LSRP #580659
Principal Hydrogeologist

cc: Mitch Gertz – Solvay
Phil Goodrum – Integral
Enclosures

integral consulting inc.

DATA REPORT

West Deptford MUA Sampling on October 30, 2013

Prepared for
Solvay Specialty Polymers USA, LLC
10 Leonard Lane
West Deptford, NJ 08086

Prepared by
Integral Consulting Inc.
200 Harry S. Truman Parkway
Suite 330
Annapolis, MD 21401

December 3, 2013

DATA REPORT

West Deptford MUA
Sampling on October 30, 2013

Prepared for
Solvay Specialty Polymers USA, LLC
10 Leonard Lane
West Deptford, NJ 08086

Prepared by

integral consulting inc.
200 Harry S. Truman Parkway
Suite 330
Annapolis, MD 21401

December 3, 2013

On October 30, 2013, Integral Consulting Inc., consultant to Solvay Specialty Polymers USA, LLC (Solvay), collected water samples from the six water supply wells maintained by the West Deptford Municipal Utility Authority (MUA). The samples were submitted to Eurofins Eaton Analytical, Inc. (Morovia, CA), a New Jersey-certified analytical testing laboratory. In addition, some samples were split and submitted to TestAmerica Laboratories, Inc. (Edison, NJ), also a New Jersey-certified analytical laboratory to evaluate inter-laboratory variability.

Table 1 summarizes the results for each sample. The data are also provided in the New Jersey Department of Environmental Protection (NJDEP) electronic data delivery (EDD) format. These EDDs were verified by Solvay to be complete and free of errors with NJDEP's online tool, Electronic Data Submittal Applications (EDSA7) version 7.1.5, available online at www.state.nj.us/dep/srp/hazsite/software/edsa/. All of the laboratory results were validated by Laboratory Data Consultants, Inc. (Carlsbad, CA), an independent third party validator.

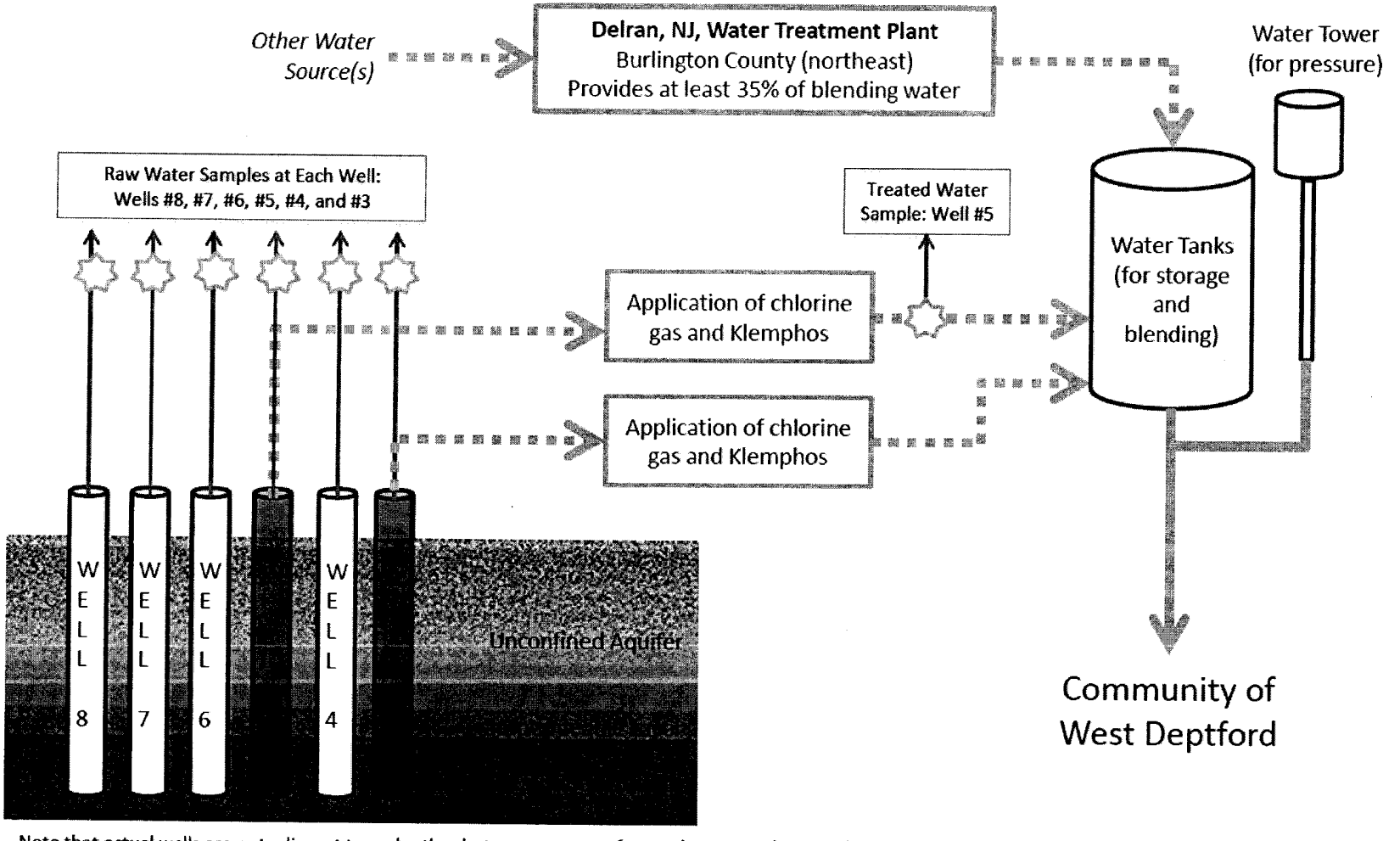
The data from the split samples indicate that there is very close agreement between results reported by the laboratories with most samples having no detectable perfluorinated compounds (PFCs). The validated split sample results from Well #3 indicate perfluorononanoic acid (PFNA) was detected at 48 parts per trillion (ppt) at one laboratory and 38 ppt at the other laboratory. The relative percent difference (RPD = difference/average) for these two results is 23 percent. Similarly, perfluorooctanoate acid (PFOA) was detected in Well #3 at 10 ppt (estimated value between method detection limit and method reporting limit) and 7.6 ppt (RPD=27 percent). The split sample variability observed for Well #3 results is within the expected range of variability for the low levels detected.

PFCs are currently unregulated in drinking water. Table 2 summarizes a range of non-binding drinking water guidelines for PFOA and perfluorooctanesulfonic acid (PFOS) available from U.S. Environmental Protection Agency, New Jersey, North Carolina, and Minnesota. For this sampling event at West Deptford MUA, PFCs were not detected in five of the six wells, including Well #5, which serves as the primary active well to provide drinking water. At Well #3, which operates intermittently based on demand at this time of year, PFCs were detected for the eight- and nine-carbon (i.e., C8 and C9) compounds PFOA and PFNA, but not PFOS or the C10 to C13 compounds. Concentrations did not exceed the New Jersey drinking water guidelines for PFOA or PFOS in either split sample.

Figure 1 illustrates where samples were collected within the West Deptford MUA treatment system. Based on our understanding of West Deptford MUA operations, the concentrations measured at individual wells do not directly reflect the finished water that is distributed to the community because the finished water is a blend of sources. West Deptford MUA, by state requirement, obtains at least 35 percent of its blended water from the New Jersey American Water Company water treatment plant in Delran, NJ. In addition, West Deptford MUA blends treated water from active wells. Currently, Well #5 is the primary source of water and treated water from Well #3 is added only intermittently on an as-needed basis. Thus, the water from

Well #3 is diluted when mixed with both the New Jersey American treatment plant and water from Well #5 prior to delivery into the water distribution system. As a result, any data associated with Well # 3 alone may not be indicative of finished water system quality.

It would be informative to collect samples of finished water as distributed to the community in order to provide a measure of PFCs in drinking water after blending from multiple sources has occurred. A sampling plan that achieves this objective will be developed following discussions with West Deptford MUA and NJDEP of the results presented in this report.



Note that actual wells are not adjacent to each other but span an area of several square miles. Depths and screening intervals are not available at this time. All six wells pump from Potomac-Raritan-Magothy (PRM) confined aquifer. Only Wells #3 and #5 were supplying water at the time of sampling due to low seasonal demand, but all six were in working order and available for raw water sampling.

integral consulting inc.

Figure 1.
Location of Raw and Treated Water Samples Collected at the West Deptford MUA

Table 1. PFC Concentrations from Samples Collected October 30, 2013 at the West Deptford MUA [a,b]

	Well #8	Well #7	Well #6	Well #5			Well #4	Well #3	
Chemical Name	RW	RW	RW	RW	FW	FW-Dup	RW	RW	FW
PFOA	--	--	--	--	-- (--)	--	--	7.6 (10 J)	NA
PFOS	--	--	--	--	-- (--)	--	--	-- (--)	NA
PFNA	--	--	--	--	-- (--)	--	--	38 (48)	NA
PFDA	--	--	--	--	-- (--)	--	--	-- (--)	NA
PFUnA	--	--	--	--	-- (--)	--	--	-- (--)	NA
PFDoDA	--	--	--	--	-- (--)	--	--	-- (--)	NA
PFTriA	--	--	--	--	-- (--)	--	--	-- (--)	NA

Notes:

FW = finished water (before further blending and distribution as drinking water - see Figure 1)

FW-Dup = finished water laboratory duplicate sample

J = result was detected at or greater than the method detection limit and less than method reporting limit

MUA = Municipal Utility Authority

NA = plumbed tap for sampling was not available at Well #3 for finished water

PFC = perfluorinated compound

RW = raw water

-- = anlayte was not detected at the calculated method detection limit

[a] Units for all results are parts per trillion (ppt).

[b] Results are based on chemical analyses performed by Eurofins Eaton Analytical. A subset of split samples were analyzed by TestAmerica and results are reported in parentheses.

Table 2. Federal and State PFC Guidelines for Drinking Water

Agency	Chemical Name [a]						
	PFOA	PFOS	PFNA	PFDA	PFUnA	PFDoDA	PFTriA
U.S. Environmental Protection Agency [b]	400	200	--	--	--	--	--
North Carolina Department of Environmental and Natural Resources [c]	200	--	--	--	--	--	--
New Jersey Department of Environmental Protection [d]	40	20	--	--	--	--	--
Minnesota Department of Health [e]	300	300	--	--	--	--	--

Sources:

USEPA. 2009. Provisional Health advisories for perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS). Available at: http://water.epa.gov/action/advisories/drinking/upload/2009_01_15_criteria_drinking_pha-PFOA_PFOS.pdf. U.S. Environmental Protection Agency. 5 pp. January 8.

NJDEP. 2007. Determination of perfluorooctanoic acid (PFOA) in aqueous samples. Final Report. New Jersey Department of Environmental Protection, Division of Water Supply, Bureau of Safe Drinking Water, Trenton, NJ. 17 pp. January.

NCDENR. 2013. Appendix #1: Interim maximum allowable concentrations (IMACs). pp. 23-24. In: North Carolina Administrative Code Title 15A - Classifications and Water Quality Standards Applicable to the Groundwaters of North Carolina. Last amended April 1. Available at: http://portal.ncdenr.org/web/wq/ps/csu/gwstandards. North Carolina Department of Environmental and Natural Resources, Division of Water Quality, Raleigh, NC. 31 pp.

MDH. 2013. Health guidelines for perfluorochemicals (PFCs) in drinking water. www.health.state.mn.us/divs/eh/hazardous/topics/pfcs/drinkingwater.html. Minnesota Department of Health, Environmental Health Division, St. Paul, MN.

Notes:

PFC = perfluorinated compound

-- = provisional guidelines are not available for drinking water

[a] Units for all results are parts per trillion (ppt).

[b] USEPA (2009) provisional drinking water advisory for short-term exposure.

[c] NCDENR (2013) recommended interim maximum allowable concentration (IMAC) in drinking water, effective date December 6, 2006.

[d] NJDEP (2007) health-based guidance value intended to protect for chronic (lifetime) exposure.

[e] MDH (2011) health risk limit (HRL) in drinking water for chronic exposure.

Abrines, David

From: Park, Andy
Sent: Thursday, June 06, 2013 9:25 AM
To: 'Gertz, Mitchell'; 'loren.lasky@dep.state.nj.us'
Subject: RE: Q/A RE: Solvay Specialty Polymers USA LLC, West Deptford, NJ (NJD980753875)

Thank you.

From: Gertz, Mitchell [mailto:mitchell.gertz@solvay.com]
Sent: Thursday, June 06, 2013 9:18 AM
To: Park, Andy; loren.lasky@dep.state.nj.us
Subject: Re: Q/A RE: Solvay Specialty Polymers USA LLC, West Deptford, NJ (NJD980753875)

The groundwater does not meet the criteria for F039 listed waste.

On Thu, Jun 6, 2013 at 8:40 AM, Park, Andy <Park.Andy@epa.gov> wrote:

Loren, thank you for the efforts providing additional information. Please see a question below in red which I think needs to be addressed as well.

The groundwater does not meet the definition of a solid waste in 40CFFR 261.2. Does it meet F039? Therefore it cannot be a hazardous waste. Additionally the groundwater would not meet any of the criteria for being classified as a hazardous waste. It is not a listed waste, it does not meet the reactivity, ignitability, corrosivity, or the TCLP criteria that would result in it being classified as a hazardous waste.

Thanks again,

Andy

From: Lasky, Loren [mailto:Loren.Lasky@dep.state.nj.us]
Sent: Wednesday, June 05, 2013 5:52 PM
To: Park, Andy
Cc: Rick Konkowski (Rick.Konkowski@erm.com); Gertz, Mitchell (mitchell.gertz@solvay.com); Marc Carver (Marc.Carver@erm.com)
Subject: Q/A RE: Solvay Specialty Polymers USA LLC, West Deptford, NJ (NJD980753875)

Hi again Andy,

This clarification is provided in response to your follow-up request for additional information about the Solvay site:

- Regarding the Air Stripper:

The strippers discharge to the atmosphere through a permitted stack emission point as part of the facility's Title V air permit.

- Regarding the Treatment of Pumped Groundwater:

The groundwater treatment system is not regulated by RCRA, and RCRA permits are not needed for the treatment process.

The groundwater does not meet the definition of a solid waste in 40CFFR 261.2. Therefore it cannot be a hazardous waste. Additionally the groundwater would not meet any of the criteria for being classified as a hazardous waste. It is not a listed waste, it does not meet the reactivity, ignitability, corrosivity, or the TCLP criteria that would result in it being classified as a hazardous waste.

The groundwater pumped from the recovery wells in the upper aquifer is treated and used in the manufacturing process. It is equivalent to the groundwater that is pumped from the confined aquifer, which is treated and used in the manufacturing process on site.

Hopefully you now have sufficient information for use in the EPA Fact Sheet.

We will be happy to entertain any further questions about the remediation process at this site.

Thank you,

Loren

Loren R. Lasky, PG
NJ Department of Environmental Protection

Bureau of Case Management

401 East State Street

PO Box 420, Mailcode 401-05F

Trenton, NJ 08625-0420

Phone: 609-633-1422

Fax: 609-633-1454

loren.lasky@dep.state.nj.us

From: Park, Andy [mailto:Park.Andy@epa.gov]
Sent: Tuesday, May 28, 2013 11:30 AM
To: Lasky, Loren
Subject: RE: Solvay Specialty Polymers USA LLC, West Deptford, NJ (NJD980753875)

Hi Loren,

Thanks for the additional information. I believe however, that the following questions still need to be answered:

- Please confirm if a RCRA permit is needed for the Equalization Tank and/or any other units utilized for the treatment of pumped groundwater. If not, please provide the rationale.

- Will the gas/air used for the air stripping be discharged into air after the stripping process? Will an air permit be needed?

Thanks again for your cooperation.

Andy

From: Lasky, Loren [mailto:Loren.Lasky@dep.state.nj.us]
Sent: Wednesday, May 22, 2013 5:29 PM
To: Park, Andy
Subject: RE: Solvay Specialty Polymers USA LLC, West Deptford, NJ (NJD980753875)

Hi Andy-

Here are further details on the groundwater treatment process at the Solvay Specialty Polymers site:

1. Water is collected from 4 Recovery Wells and held in an Equalization Tank.

2. The water is treated via Air Stripping, followed by pH neutralization and clarification.

   (Solids from clarification are non-hazardous and managed in accordance with NJDEP requirements.)

3. Clarified water is stored in a holding tank, and combined with additional water pumped onsite from the confined aquifer.

   (Onsite water is a permitted source for process water.)

4. The treated water thus produced is fully re-used (100 % re-used) in the onsite manufacturing process.

5. Process water is then either treated and discharged into the Delaware River under terms of Solvay's NJPDES permit, or,

   treated and discharged to the POTW in accordance with Solvay's industrial pretreatment permit.

I trust this provides sufficient information for use in the EPA Fact Sheet.

Please do not hesitate to contact the DEP again with any questions about the remediation process at this site.

Thank you,

Loren

Loren R. Lasky, PG
NJ Department of Environmental Protection

Bureau of Case Management

401 East State Street

PO Box 420, Mailcode 401-05F

Trenton, NJ 08625-0420

Phone: 609-633-1422

Fax: 609-633-1454

loren.lasky@dep.state.nj.us

From: Park, Andy [mailto:Park.Andy@epa.gov]
Sent: Wednesday, May 15, 2013 8:41 AM
To: Lasky, Loren
Subject: RE: Solvay Specialty Polymers USA LLC, West Deptford, NJ (NJD980753875)

Hi Loren,

Thanks for the input.

It looks good but I have questions concerning the statements at the end of the first paragraph under "Cleanup Approach and Progress." Can you please elaborate/provide more information on: what treatment is provided for pumped groundwater? what are the criteria, if any, for allowing treated groundwater to be reused? where is it reused? where does it go after reuse?

Thanks again.

Andy

From: Lasky, Loren [mailto:Loren.Lasky@dep.state.nj.us]
Sent: Tuesday, May 14, 2013 6:38 PM
To: Park, Andy
Subject: RE: Solvay Specialty Polymers USA LLC, West Deptford, NJ (NJD980753875)

Andy

Attached is the edited version of the EPA Fact Sheet for the Solvay Specialty Polymers USA, LLC facility in West Deptford, NJ,

as per your recent request.

thanks,

Loren

Loren R. Lasky, PG
NJ Department of Environmental Protection

Bureau of Case Management

401 East State Street

PO Box 420, Mailcode 401-05F

Trenton, NJ 08625-0420

Phone: 609-633-1422

Fax: 609-633-1454

loren.lasky@dep.state.nj.us

From: Park, Andy [mailto:Park.Andy@epa.gov]
Sent: Tuesday, May 14, 2013 8:58 AM
To: Lasky, Loren
Subject: RE: Solvay Specialty Polymers USA LLC, West Deptford, NJ (NJD980753875)

OK, Loren. Thanks.

From: Lasky, Loren [mailto:Loren.Lasky@dep.state.nj.us]
Sent: Monday, May 13, 2013 5:11 PM
To: Park, Andy
Subject: RE: Solvay Specialty Polymers USA LLC, West Deptford, NJ (NJD980753875)

Hi Andy—

Solvay has chosen to provide their own response first, after which I will add any

additional comments, if more are needed.

Thanks,

Loren

Loren R. Lasky, PG
NJ Department of Environmental Protection

Bureau of Case Management

401 East State Street

PO Box 420, Mailcode 401-05F

Trenton, NJ 08625-0420

Phone: 609-633-1422

Fax: 609-633-1454

loren.lasky@dep.state.nj.us

From: Park, Andy [mailto:Park.Andy@epa.gov]
Sent: Thursday, May 09, 2013 12:55 PM
To: Lasky, Loren; 'mitchell.gertz@solvay.com'
Subject: Solvay Specialty Polymers USA LLC, West Deptford, NJ (NJD980753875)

Good afternoon,

Attached please see a draft fact sheet. Please provide me with any comments that you may have by May 16, 2013.

Thank you,

Andrew Park

Hazardous Waste Programs Branch

Clean Air and Sustainability Division

U.S. Environmental Protection Agency Region 2

290 Broadway, 22nd Fl.

New York, New York 10007-1866

212-637-4184

park.andy@epa.gov

--

Mitch Gertz
Specialty Polymers
HSE Compliance Manager
T: 856-251-6630 - M: 856-371-9318
10 Leonard Lane
West Deptford, NJ 08086
www.solvay.com